

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA.

Plaintiff

V.

ROMAN VALERIVICH SELEZNEV.

Defendant

NO. CR11-0070RAJ

**MOTION FOR LEAVE TO FILE
OVERLENGTH BRIEF**

Note on Motion Calendar: May 27, 2016

The United States of America, by and through Annette L. Hayes, United States Attorney for the Western District of Washington, Leslie R. Caldwell, Assistant Attorney General, Norman M. Barbosa and Seth Wilkinson, Assistant United States Attorneys for said District, and Harold Chun, Trial Attorney, Computer Crime and Intellectual Property Section, hereby seeks an order from this Court permitting the United States to file the Response to Defendant's Motion to Suppress in excess of the twelve-page limitation prescribed in CrR 12(c)(6) of the Local Rules of the United States District Court for the Western District of Washington. Defendant has no objection to this request.

In support of this motion, the government states the following:

1. The government's response must address several distinct issues raised in the defendant's motion to suppress including three separate theories of suppression.

2. Although defendant's motion to suppress is less than twelve pages in length, it includes over 100 pages of attachments. Defendant's expert report, which sets forth the bulk of defendant's arguments in support of suppression, is 27 pages. Defendant has also included a 9 page supplemental declaration from their expert setting forth additional arguments.

3. The government requests approval to file a memorandum of up to 20 pages to provide the Court with a full and complete summary of the relevant facts and to adequately frame and respond to the issues raised by the defendant.

Based on the foregoing, the United States respectfully requests that the Court grant this motion to file a memorandum not to exceed 20-pages.

CONCLUSION

For the reasons set forth above, the United States respectfully requests that the Court grant the Government leave to file a response consisting of up to 20 pages.

DATED this 17th day of May, 2016.

Respectfully submitted,

**ANNETTE L. HAYES
United States Attorney**

s/ Norman M. Barbosa
NORMAN M. BARBOSA

s/ Seth Wilkinson

SETH WILKINSON

Assistant United Sta

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s/ Harold Chun

HAROLD CHUN
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1 CERTIFICATE OF SERVICE
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I hereby certify that on May 17, 2016, I electronically filed the foregoing with the
Clerk of Court using the CM/ECF system which will send notification of such filing to
the attorney of record for the defendant.

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